

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**DONNA K. SOUTTER, *for herself and on  
behalf of others similarly situated individuals,***

**Plaintiffs,**

**v.**

**EQUIFAX INFORMATION SERVICES, LLC,**

**Defendants.**

**Civil Action No. 3:10cv107-REP**

**PLAINTIFF'S SUPPLEMENTAL FED. R. CIV. P. 26(a)(1) DISCLOSURES**

COMES NOW the Plaintiff, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following supplemental disclosures to Defendant. Plaintiff reserves the right to further supplement these initial disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these supplemental initial disclosures, Plaintiffs do not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, in this action or any other action. Plaintiff also does not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

**II. Description of additional documents in possession of the Plaintiff.**

j. Equifax Third Quarter 2010 Results – News Release.

**DONNA K. SOUTTER *on behalf of herself and other similarly situated individuals,***

/s/  
Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
12515 Warwick Boulevard, Suite 100  
Newport News, Virginia 23606  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
[lenbennett@cox.net](mailto:lenbennett@cox.net)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of January, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John W. Montgomery, Jr., Esq. Montgomery & Simpson, LLLP 2116 Dabney Road Suite A-1 Richmond, VA 23230 <a href="mailto:jmontgomery@jwm-law.com">jmontgomery@jwm-law.com</a>	Barry Goheen, Esq. King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521
John Anthony Love King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521 <a href="mailto:tlove@kslaw.com">tlove@kslaw.com</a>	Keasha Ann Broussard, Esq. King & Spalding 1180 Peachtree Street, NE Atlanta, GA 30309-3521 <a href="mailto:abroussard@kslaw.com">abroussard@kslaw.com</a>

/s/  
Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
12515 Warwick Boulevard, Suite 100  
Newport News, Virginia 23606  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
[lenbennett@cox.net](mailto:lenbennett@cox.net)